

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

IN THE MATTER OF:)
718 West Wilson Avenue)
Glendale, California)
)
Remy Mazmanian,)
)
Respondent)

UNILATERAL ADMINISTRATIVE
ORDER FOR REMOVAL RESPONSE
ACTIVITIES

U.S. EPA Region 9
CERCLA
Docket No. 2008-06

Proceeding Under Section 106(a) of the
Comprehensive Environmental Response,
Compensation, and Liability Act, as
amended, 42 U.S.C. §9606(a)

TABLE OF CONTENTS

I.	JURISDICTION AND GENERAL PROVISIONS.....	3
II.	PARTIES BOUND	3
III.	DEFINITIONS.....	3
IV.	FINDINGS OF FACT.....	5
V.	CONCLUSIONS OF LAW AND DETERMINATIONS	6
VI.	ORDER	7
VII.	AUTHORITY OF EPA PROJECT MANAGER	13
VIII.	ENFORCEMENT: PENALTIES FOR NON-COMPLIANCE	13
IX.	REIMBURSEMENT OF OVERSIGHT COSTS	13
X.	RESERVATION OF RIGHTS	14
XI.	OTHER CLAIMS.....	14
XII.	MODIFICATIONS	15
XIII.	NOTICE OF COMPLETION	15
XIV.	ACCESS TO ADMINISTRATIVE RECORD.....	15
XV.	OPPORTUNITY TO CONFER.....	15
XVI.	INSURANCE	16
XVII.	ADDITIONAL REMOVAL ACTIONS	16
XVIII.	SEVERABILITY	16
XIX.	EFFECTIVE DATE	17

I. JURISDICTION AND GENERAL PROVISIONS

- 1) This Order is issued pursuant to the authority vested in the President of the United States by section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. § 9606(a), as amended ("CERCLA"), and delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the Regional Administrators by EPA Delegation Nos. 14-14-A and 14-14-B, and by the Regional Administrator, through the Director, Superfund Division, to the Superfund Branch Chiefs by Regional Order R9-1290.14a.
- 2) This Order pertains to property located at 718 West Wilson Avenue, in Glendale, California, ("Property"), which constitutes a portion of the former location of the Drilube Company ("Drilube Site" or the "Site"). This Order requires the Respondent to conduct removal actions described herein to abate an imminent and substantial endangerment to the public health, welfare or the environment that may be presented by the actual or threatened release of hazardous substances at or from the Site.
- 3) EPA has notified the state of California of this action pursuant to section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

II. PARTIES BOUND

- 4) This Order applies to and is binding upon Respondent and Respondent's heirs, employees, agents, successors and assigns. Any change in ownership or corporate status of Respondent including, but not limited to, any transfer of assets or real or personal property shall in no way alter Respondent's responsibilities under this Order.
- 5) Respondent shall ensure that his contractors, subcontractors, and representatives receive a copy of this Order and comply with this Order. Respondent shall be responsible for any noncompliance with this Order.

III. DEFINITIONS

- 6) Unless otherwise expressly provided herein, terms used in this Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in CERCLA or in such regulations. Whenever terms listed below are used in this Order or in the appendices attached hereto and incorporated hereunder, the following definitions shall apply:
 - a) CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601, *et seq.*

- b) "Day" shall mean a calendar day. In computing any period of time under this Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
- c) "Effective Date" shall be the effective date of this Order as provided in Section XIX.
- d) "EPA" shall mean the United States Environmental Protection Agency and any successor departments or agencies to EPA of the United States.
- e) "Interest" shall mean interest at the rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a). The applicable rate of interest shall be the rate in effect at the time the interest accrues. The rate of interest is subject to change on October 1 of each year.
- f) "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, codified at 40 C.F.R. Part 300, and any amendments thereto.
- g) "Paragraph" shall mean a portion of this Order identified by an Arabic numeral.
- h) "Parties" shall mean EPA and Respondent.
- i) "Property" shall mean the portion of the former Drilube Company property located at 718 West Wilson Avenue in Glendale, California.
- j) "RCRA" shall mean the Solid Waste Disposal Act, as amended, 42 U.S.C. §§ 6901, *et seq.* (also known as the Resource Conservation and Recovery Act).
- k) "RWQCB" shall mean the Regional Water Quality Control Board – Los Angeles Region, and any successor departments or agencies of the RWQCB.
- l) "Respondent" shall mean Remy Mazmanian and his heirs, successors and assigns.
- m) "Response Costs" shall mean all costs, including, but not limited to, direct and indirect costs, that the United States incurs or has incurred in reviewing or developing plans, reports and other items related to the Property, verifying the Work, or otherwise implementing, overseeing, or enforcing this Order, including but not limited to, payroll costs, contractor costs, travel costs, laboratory costs, and the costs incurred pursuant to Paragraph 32 (costs and attorneys fees and any monies paid to secure access, including the amount of just compensation) and Paragraph 38 (emergency response).
- n) "Section" shall mean a portion of this Order identified by a Roman numeral.

- o) "Site" or "Drilube Site" shall mean the former Drilube facility located at 711 West Broadway and 718 West Wilson Avenue in Glendale, California.
- p) "State" shall mean the state of California.
- q) "Waste Material" shall mean (1) any "hazardous substance" under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14); (2) any pollutant or contaminant under Section 101(33) of CERCLA, 42 U.S.C. § 9601(33); (3) any "solid waste" under Section 1004(27) of RCRA, 42 U.S.C. § 6903(27); and (4) any "hazardous material" or "hazardous substance" under California law.
- r) "Work" shall mean all activities Respondent is required to perform under this Order.
- s) "Work Plan" shall mean the approved Work Plan for implementation of the investigation required by this Order, as set forth in Appendix A to this Order, and any modifications made thereto in accordance with this Order.

IV. FINDINGS OF FACT

- 7) The Drilube Company was located at 711 West Broadway and 718 West Wilson Avenue in Glendale, California, and operated from approximately 1945 until 2004. (The portion of the facility at 711 West Broadway burned down in a fire in 2002.) The Drilube Company operated in the West Broadway building for over twelve years and in the West Wilson Avenue building for over forty years.
- 8) The Drilube Company operated an aerospace and aircraft plating, painting and metal finishing operation. The plating operations involved processing with both industrial and decorative applications of copper, nickel and chromium plating solutions. In addition, the aerospace and aircraft application involved use of both cadmium and zinc solutions. Operations included the application of a wide variety of organic polymeric products and the use of solvents and solvent mixtures as well as applications of a patented molybdenum disulfide-based "Drilube" product. Metal finishing involved topical surface preparations, including the application of zinc and manganese phosphates, miscellaneous iridite and chromated coatings, solvent rinsing, vapor degreasing and alkaline cleaning operations, anodizing operations, acid etching and electro-finishing. Metal plating and finishing operations were performed in both buildings.
- 9) The Property layout included the plating areas, waste treatment area, and chemical storage rooms. Several sumps and pits were located on the Property associated with the plating processes. A fourstage clarifier was located along the southwest wall of the waste treatment area. A degreaser was located inside the main plating area. There were thirteen fixed treatment units located on the Property which were subject to Permit By Rule regulations. The fixed treatment units included five treatment pit units, one pre-treatment container unit, one settling unit, three container treatment units, one vacuum filter process unit, one filter press, and one elementary neutralization unit. Chemicals used at the Property over the years

included chromic acid, muriatic acid, nickel compounds, sodium hydroxide, ammonium hydroxide, caustic potash, ammonium nitrate, silver cyanide, copper cyanide, nitric acid, sodium dichromate, sulfuric acid, manganese phosphate, zinc phosphate, and various alkaline cleaners.

- 10) Based on information obtained from past site assessments, Drilube's past activities have contributed to VOC and metals contamination in soil and groundwater beneath the Property and the Site. The California Maximum Contaminant Levels ("MCL") for TCE and PCE in drinking water are each 5 ug/L, and the MCL for CrVI is 50 ug/L. Elevated levels of chromium contamination in soil were detected up to 3,420 mg/kg (milligrams per kilogram) at the Property in 1991. Groundwater concentrations of trichloroethylene (TCE) were detected at the Property at 11,000 ug/L in 1996. Groundwater concentrations of tetrachloroethylene (PCE) were detected at 1,960 ug/L at the Property in 1999, and of hexavalent chromium (CrVI) at 32,000 ug/L in 1995. In EPA groundwater monitoring well MW-1, which is downgradient of the Property, concentrations of TCE were detected at 280 ug/L TCE in 1996, of PCE at 1,300 ug/L PCE in 1999, and of CRVI at 13,000 ug/L in 1994.
- 11) Soil samples were collected at the Property in 2004 and analyzed for VOCs and heavy metals. The results of the analysis indicated that the subsurface soil in the former waste treatment area (soil borings SB8 through SB12, SB29, and SB30) had been impacted with total chromium. Concentrations of total chromium were detected in the soil samples collected in this area at concentrations up to 120,000 milligrams ug/L.
- 12) The Site is within the San Fernando Valley Area 2 Superfund Site, Glendale Operable Units, and was identified as a potential source of VOC contamination by EPA in or around 1993. The Site's then-current owner and operator, Walter Fairfax and Drilube Company, respectively, received General and Special Notice to participate in negotiations for a consent decree to implement EPA's Glendale North and South Records of Decision ("RODs"), but declined to participate in such negotiations.
- 13) Walter Fairfax transferred ownership of the Property to Devin Industries in or around 1999. Respondent purchased the Property at 718 West Wilson Avenue in April 2004 from Devin Industries. Respondent is the person currently responsible for all environmental actions and decisions related to the operation of the Property. Respondent did not investigate or obtain information on the environmental condition of the Property, including but not limited to prior or existing releases of hazardous substances at the Property or the Site, prior to purchasing the Property.

V. CONCLUSIONS OF LAW AND DETERMINATIONS

Based on the Findings of Fact set forth above, and the Administrative Record supporting this removal action, EPA has determined that:

- 14) The Site is a "facility" as defined by section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

- 15) The contaminants found at the Site, as identified in the Findings of Fact above, include "hazardous substance(s)" as defined by section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- 16) Respondent is a "person" as defined by section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
- 17) Respondent is the "owner" and/or "operator" of the facility, as defined by section 101(20) of CERCLA, 42 U.S.C. § 9601(20), and within the meaning of section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1).
- 18) The conditions described in the Findings of Fact above constitute an actual or threatened "release" of a hazardous substance from the facility as defined by sections 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- 19) The conditions present at the Site constitute an imminent and substantial endangerment to public health, welfare, or the environment.
- 20) The actual or threatened release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of section 106(a) of CERCLA, 42 U.S.C. § 9606(a).
- 21) The removal actions required by this Order are necessary to protect the public health, welfare, or the environment, and are not inconsistent with the NCP and CERCLA.

VI. ORDER

- 22) Based upon the foregoing Findings of Fact, Conclusions of Law, Determinations, and the Administrative Record for this Site, EPA hereby orders that Respondent comply with the following provisions, including but not limited to all attachments to this Order, all documents incorporated by reference into this Order, and all schedules and deadlines in this Order, attached to this Order, or incorporated by reference into this Order, and perform the following actions:

- 23) Notice of Intent to Comply

Respondent shall notify EPA in writing within ten (10) days after the Effective Date of this Order of Respondent's irrevocable intent to comply with this Order. Failure of Respondent to provide such notification within this time period shall be a violation of this Order by Respondent.

- 24) Designation of Contractor: Respondent shall perform the removal action himself or retain a contractor to perform the removal action. Respondent shall notify EPA of Respondent's qualifications or the name and qualifications of such contractor within fifteen (15) days of the effective date of this Order. Respondent shall also notify EPA of the name(s) and qualification(s) of any other contractor or subcontractor retained to perform the removal action under this Order at least ten (10) days prior to commencement of such removal action. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained

by the Respondent, or of Respondent's choice of himself to do the removal action. If EPA disapproves of a selected contractor or Respondent, Respondent shall retain a different contractor or notify EPA that it will perform the removal action himself within five (5) days following EPA's disapproval and shall notify EPA of that contractor's name or Respondent's name and qualifications within five (5) days of EPA's disapproval.

25) Designation of Project Coordinator and EPA Project Manager: Within ten (10) days after the effective date of this Order, the Respondent shall designate a Project Coordinator who shall be responsible for administration of all the Respondent's actions required by the Order. Respondent shall submit the designated coordinator's name, address, telephone number, and qualifications to EPA. To the greatest extent possible, the Project Coordinator shall be present on-site or readily available during site work. EPA retains the right to disapprove of any Project Coordinator named by the Respondent. If EPA disapproves of a selected Project Coordinator, Respondent shall retain a different Project Coordinator and shall notify EPA of that person's name and qualifications within five (5) business days following EPA's disapproval. Receipt by Respondent's Project Coordinator of any notice or communication from EPA relating to this Order shall constitute receipt by Respondent.

26) The EPA has designated Robert Fitzgerald of the Region 9 Superfund Division as its Project Manager. Respondent shall direct all submissions required by this Order to the Project Manager at 75 Hawthorne Street, SFD-7-4, San Francisco, CA, 94105 and contemporaneously at Fitzgerald.Bob@epa.gov.

27) Work to Be Performed

Respondent shall perform, at a minimum, the following removal action:

a) Respondent shall perform a subsurface investigation at the former Drilube property at 718 West Wilson Avenue in Glendale, California (the Property) to fully characterize the extent of soil and groundwater contamination by contaminants of concern. Respondent shall perform, at a minimum, the actions required by the attached SOW. The SOW constitutes the first phase of the soil and groundwater investigation at the Property.

b) SOW and Implementation.

(1) Respondent shall perform the actions required by the SOW in accordance with the schedule set forth at Paragraph 6 of the SOW.

(2) EPA may approve, disapprove, require revisions to, or modify any work plan and/or proposed schedule that may be submitted by Respondent in whole or in part. If EPA requires revisions, Respondent shall submit a revised draft work plan within ten (10) days of receipt of EPA's notification of the required revisions. Respondent shall implement the work plan as approved in writing by EPA in accordance with the schedule approved by EPA. Once approved, or approved with modifications,

the work plan, the schedule, and any subsequent modifications shall be incorporated into and become fully enforceable under this Order.

- (3) Respondent shall not commence any Work except in conformance with the terms of this Order.

28) Health and Safety Plan. Within ten (10) days after the Effective Date, Respondent shall submit for EPA review and comment a plan that ensures the protection of the public health and safety during performance of on-site work under this Order. This plan shall be prepared in accordance with EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414, June 1992). In addition, the plan shall comply with all currently applicable Occupational Safety and Health Administration ("OSHA") regulations found at 29 C.F.R. Part 1910. If EPA determines that it is appropriate, the plan shall also include contingency planning. Respondent shall incorporate all changes to the plan recommended by EPA and shall implement the plan during the implementation of the Work required by this Order.

29) Quality Assurance and Sampling.

- a) All sampling and analyses performed pursuant to this Order shall conform to EPA direction, approval, and guidance regarding sampling, quality assurance/quality control ("QA/QC"), data validation, and chain of custody procedures. Respondent shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with the appropriate EPA guidance. Respondent shall follow, as appropriate, "Quality Assurance/Quality Control Guidance for Removal Activities: Sampling QA/QC Plan and Data Validation Procedures" (OSWER Directive No. 9360.4-01, April 1, 1990), as guidance for QA/QC and sampling. Respondent shall only use laboratories that have a documented Quality System that complies with ANSI/ASQC E-4 1994, "Specifications and Guidelines for Quality Systems for Environmental Data Collection and Environmental Technology Programs" (American National Standard, January 5, 1995), and "EPA Requirements for Quality Management Plans (QA/R-2) (EPA/240/B-01/002, March 2001)," or equivalent documentation as determined by EPA. EPA may consider laboratories accredited under the National Environmental Laboratory Accreditation Program ("NELAP") as meeting the Quality System requirements.
- b) Upon request by EPA, Respondent shall have such a laboratory analyze samples submitted by EPA for QA monitoring. Respondent shall provide to EPA the QA/QC procedures followed by all sampling teams and laboratories performing data collection and/or analysis.
- c) Upon request by EPA, Respondent shall allow EPA or its authorized representatives to take split and/or duplicate samples. Respondent shall notify EPA not less than five (5) days in advance of any sample collection activity, unless shorter notice is agreed to by EPA. EPA shall have the right to take any additional samples that EPA deems necessary. Upon request, EPA shall allow Respondent to take split or duplicate samples of any samples it takes as part of its oversight of Respondent's implementation of the Work.

30) Reporting.

- a) Respondent shall submit a written progress report to EPA concerning actions undertaken pursuant to this Order on the last day of each month after the date of this Order until termination of this Order, unless otherwise directed in writing by the EPA Project Manager. These reports shall describe all significant developments during the preceding period, including the actions performed and any problems encountered, analytical data received during the reporting period, and the developments anticipated during the next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems.
- b) Respondent shall submit two (2) copies of all plans, reports or other submissions required by this Order, the SOW, or any approved work plan. Respondent shall also submit such documents in electronic form.
- c) Respondent shall, at least thirty (30) days prior to the conveyance of any interest in real property at the Property, give written notice to the transferee that the Property is subject to this Order and written notice to EPA and the RWQCB of the proposed conveyance, including the name and address of the transferee. Respondent shall require any such successors to comply with the immediately preceding sentence and Paragraph 32 (Access to Property and Information).

31) Final Report. Within thirty (30) days after completion of all Work required by this Order, Respondent shall submit for EPA review and approval a final report summarizing the actions taken to comply with this Order. The final report shall conform, at a minimum, with the requirements set forth in Section 300.165 of the National Contingency Plan ("NCP") entitled "OSC Reports." The final report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Order, a listing of quantities and types of materials removed off-Site or handled on-Site, a discussion of removal and disposal options considered for those materials, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action (*e.g.*, manifests, invoices, bills, contracts, and permits). The final report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

"Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

32) Access to Property and Information: Respondent shall provide and/or obtain access to the Property and the Site and off-site areas to which access is necessary to implement this order,

and provide access to all records and documentation related to the conditions at the Site and the action conducted pursuant to this Order. Such access shall be provided to EPA employees, contractors, agents, consultants, designees, representatives, and state of California representatives. These individuals shall be permitted to move freely at the Property, the Site and appropriate off-site areas in order to conduct actions which EPA determines to be necessary. Respondent shall submit to EPA, upon receipt, the results of all sampling or tests and all other data generated by Respondent or its contractor, or on the Respondent's behalf during implementation of this Order.

33) Where action under this Order is to be performed in areas owned by or in possession of someone other than Respondent, Respondent shall use his best efforts to obtain all necessary access agreements within ten (10) days after the Effective Date of this Order, or as otherwise specified in writing by the Project Manager. Respondent shall immediately notify EPA if after using its best efforts it is unable to obtain such agreements. Respondent shall describe in writing its effort(s) to obtain access. EPA may then assist Respondent in gaining access, to the extent necessary to effectuate the removal actions described herein, using such means as EPA deems appropriate. EPA reserves the right to seek reimbursement from Respondent for all costs and attorney's fees incurred by the United States in obtaining access for Respondent.

34) Record Retention, Documentation, Availability of Information: Respondent shall preserve all documents and information relating to work performed under this Order, or relating to the hazardous substances found on or released from the Site, for ten years following completion of the removal actions required by this Order. At the end of this ten year period and thirty (30) days before any document or information is destroyed, Respondent shall notify EPA that such documents and information are available to EPA for inspection, and upon request, shall provide the originals or copies of such documents and information to EPA. In addition, Respondent shall provide documents and information retained under this Section at any time before expiration of the ten year period at the written request of EPA.

35) Respondent may assert a business confidentiality claim pursuant to 40 C.F.R. § 2.203(b) with respect to part or all of any information submitted to EPA pursuant to this Order, provided such claim is allowed by section 104(e)(7) of CERCLA, 42 U.S.C. § 9604(e)(7). Analytical and other data specified in section 104(e)(7)(F) of CERCLA shall not be claimed as confidential by the Respondent. EPA shall only disclose information covered by a business confidentiality claim to the extent permitted by, and by means of the procedures set forth at, 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, EPA may make it available to the public without further notice to Respondent.

36) Off-Site Shipments

All hazardous substances, pollutants or contaminants removed off-site pursuant to this Order for treatment, storage, or disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with 42 U.S.C. § 9621(d)(3) and the EPA "Revised Procedures for Implementing Off-Site Response Actions," OSWER Directive Number 9834.11, November 13, 1987. Regional Offices will provide information on the acceptability of a facility under section

121(d)(3) of CERCLA and the above directive. Unless impracticable, prior notification of out-of-state waste shipments shall be given consistent with "Notification of Out-of State Shipments of Superfund Site Wastes," OSWER Directive 9330.2-07, September 1989.

37) Compliance With Other Laws

Respondent shall perform all actions required pursuant to this Order in accordance with all applicable local; state; and federal laws and regulations except as provided in CERCLA section 121(e) and 40 C.F.R. § 300.415(i). In accordance with 40 C.F.R. § 300.415(i), all on-site actions required pursuant to this Order shall, to the extent practicable, as determined by EPA, considering the exigencies of the situation, attain applicable or relevant and appropriate requirements ("ARARs") under federal environmental, state environmental, or facility siting laws. (see "The Superfund Removal Procedures for Consideration of ARARs During Removal Actions," OSWER Directive No. 9360.3-02, August 1991). Respondent shall identify ARARs in the Work Plan subject to EPA approval.

38) Emergency Response and Notification of Releases

- a) If any incident, or change in site conditions, during the actions conducted pursuant to this Order causes or threatens to cause an additional release of hazardous substances from the Site or an endangerment to the public health, welfare, or the environment, the Respondent shall immediately take all appropriate action. The Respondent shall take these actions in accordance with all applicable provisions of this Order, including, but not limited to the Health and Safety Plan, in order to prevent, abate or minimize such release or endangerment caused or threatened by the release. Respondent shall also immediately notify the RPM or, in the event of his unavailability, the Regional Duty Officer for the Region IX Emergency Planning and Response Branch, at (800) 300-2193, and the National Response Center at (800) 424-8802 of the incident or Site conditions. If Respondent fails to take action, then EPA may respond to the release or endangerment and reserve the right to pursue cost recovery.
- b) In addition, in the event of any release of a hazardous substance, Respondent shall immediately notify EPA's Project Manager at 415 972-3173 and the National Response Center at telephone number (800) 424-8802. Respondent shall submit a written report to EPA within seven (7) days after each release, setting forth the events that occurred and the measures taken or to be taken to mitigate any release or endangerment caused or threatened by the release and to prevent the reoccurrence of such a release. This reporting requirement is in addition to, not in lieu of, reporting under CERCLA section 103(c) and section 304 of the Emergency Planning and Community Right-To-Know Act of 1986, 42 U.S.C. Sections 11001 et seq.

VII. AUTHORITY OF THE EPA PROJECT MANAGER

- 39) The EPA Project Manager shall be responsible for overseeing the proper and complete implementation of this Order. The EPA Project Manager shall have the authority vested in an On-Scene Coordinator by the NCP, 40 CFR 300.120, including the authority to halt, conduct, or direct any action required by this Order, or to direct any other removal action undertaken by EPA or Respondent at the Site. Absence of the EPA Project Manager from the Site shall not be cause for stoppage of work unless specifically directed by the EPA Project Manager.
- 40) EPA shall have the right to change its Project Manager and Respondent shall have the right to change its designated Project Coordinator. EPA shall notify the Respondent as soon as practicable before such a change is made, and Respondent shall notify EPA not less than ten (10) days, before such a change is made. Notification may initially be made orally, but shall be followed promptly by written notice.

VIII. ENFORCEMENT: PENALTIES FOR NONCOMPLIANCE

- 41) Violation of any provision of this Order may subject Respondent to civil penalties of up to thirty-two thousand, five hundred dollars per violation per day, as provided in section 106(b)(1) of CERCLA, 42 U.S.C. § 9606(b)(1). Respondent may also be subject to punitive damages in an amount up to three times the amount of any cost incurred by the United States as a result of such violation, as provided in section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3). Should Respondent violate this Order or any portion hereof, EPA may carry out the required actions unilaterally, pursuant to section 104 of CERCLA, 42 U.S.C. § 9604, and/or may seek judicial enforcement of this Order pursuant to section 106 of CERCLA, 42 U.S.C. § 9606.

IX. REIMBURSEMENT OF OVERSIGHT COSTS

- 42) Respondent shall reimburse EPA, upon written demand, for all response costs incurred by the United States in overseeing Respondent's implementation of the requirements of this Order. EPA may submit to Respondent on a periodic basis a bill for all response costs incurred by the United States with respect to this Order. EPA's SCORES Report or any succeeding report adopted by EPA, which includes direct and indirect costs incurred by EPA and its contractors as certified by EPA, shall serve as the basis for payment demands.
- 43) Respondent shall, within thirty (30) days of receipt of the bill, remit a cashiers or certified check for the amount of those costs made payable to the "Hazardous Substance Superfund," to the following address:

US Environmental Protection Agency
Superfund Payments

Cincinnati Finance Center
PO Box 979076
St. Louis, MO 63197-9000

Respondent shall simultaneously transmit a copy of the check to EPA Project Manager at 75 Hawthorne Street, SFD7-4, San Francisco, CA 94105. Payments shall be designated as "Response Costs-former Drilube site" and shall reference the payor's name and address, the EPA site identification number 09-QY and the docket number of this Order.

- 44) Interest at the rate established under section 107(a) of CERCLA shall begin to accrue on the unpaid balance from the day of the original demand notwithstanding any dispute or objection to any portion of the costs.

X. RESERVATION OF RIGHTS

- 45) Except as specifically provided in this Order, nothing herein shall limit the power and authority of EPA or the United States to take, direct, or order all actions necessary to protect public health, welfare, or the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants or contaminants, or hazardous or solid waste on, at, or from the Site. Further, nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Order, from taking other legal or equitable action as it deems appropriate and necessary, or from requiring the Respondent in the future to perform additional activities pursuant to CERCLA or any other applicable law. EPA reserves the right to bring an action against Respondent under section 107 of CERCLA, 42 U.S.C. section 9607, for recovery of any response costs incurred by the United States related to this Order or the Site and not reimbursed by Respondent.

XI. OTHER CLAIMS

- 46) By issuance of this Order, the United States and EPA assume no liability for injuries or damages to persons or property resulting from any acts or omissions of Respondent. The United States or EPA shall not be deemed a party to any contract entered into by the Respondent or its directors, officers, employees, agents, successors, representatives, assigns, contractors, or consultants in carrying out actions pursuant to this Order.
- 47) This Order does not constitute a pre-authorization of funds under section 111(a)(2) of CERCLA, 42 U.S.C. § 9611(a)(2). Nothing in this Order shall constitute a satisfaction of or release from any claim or cause of action against the Respondent or any person not a party to this Order, for any liability such person may have under CERCLA, other statutes, or the common law, including but not limited to any claims of the United States for costs, damages and interest under section 106(a) and 107(a) of CERCLA, 42 U.S.C. § 9606(a) and 9607(a).

XII. MODIFICATIONS

- 48) Modifications to any plan or schedule or the attached EPA SOW may be made in writing by the EPA Project Manager or at the EPA Project Manager's oral direction. If the EPA Project Manager makes an oral modification, it will be memorialized in writing within five (5) days; provided, however, that the effective date of the modification shall be the date of the EPA Project Manager's oral direction. The rest of the Order, or any other portion of the Order may only be modified in writing by signature of the EPA Region 9 Superfund Branch Chief.
- 49) If Respondent seeks permission to deviate from any approved plan or schedule or the SOW, Respondent's Project Coordinator shall submit a written request to EPA for approval outlining the proposed modification and its basis.
- 50) No informal advice, guidance, suggestion, or comment by EPA regarding reports, plans, specifications, schedules, or any other writing submitted by the Respondent shall relieve the Respondent of its obligation to obtain such formal approval as may be required by this Order, and to comply with all requirements of this Order unless it is formally modified.

XIII. NOTICE OF COMPLETION

- 51) When EPA determines, after EPA's review of the Final Report, that all removal actions have been fully performed in accordance with this Order, with the exception of any continuing obligations required by this Order, EPA will provide notice to the Respondent. If EPA determines that any removal actions have not been completed in accordance with this Order, EPA will notify the Respondent, provide a list of the deficiencies, and require that Respondent submit a Work Plan or modify the existing Work Plan, if any, to correct such deficiencies. The Respondent shall implement the approved Work Plan and shall submit a modified Final Report in accordance with the EPA notice. Failure by Respondent to implement the approved modified Work Plan shall be a violation of this Order.

XIV. ACCESS TO ADMINISTRATIVE RECORD

- 52) The Administrative Record supporting these removal actions is available for review at the Superfund Records Center, 95 Hawthorne Street, 4th floor, San Francisco, CA, 94105, (415) 536-2000.

XV. OPPORTUNITY TO CONFER

- 53) Within two (2) days after issuance of this Order, Respondent may request a conference with EPA. Any such conference shall be held within five (5) days after the original Effective Date of this Order (five days after execution by the Superfund Branch Chief) unless extended by agreement of the parties. At any conference held pursuant to the request, Respondent may appear in person or be represented by an attorney or other representative.

54) If a conference is held, Respondent may present any information, arguments or comments regarding this Order. Regardless of whether a conference is held, Respondent may submit any information, arguments or comments in writing to EPA within ten (10) days following the conference, or within ten (10) days following issuance of the Order if no conference is requested. This conference is not an evidentiary hearing, does not constitute a proceeding to challenge this Order, and does not give Respondent a right to seek review of this Order. Requests for a conference, or any written submittal under this paragraph, shall be directed to Marie Rongone, Senior Counsel, 75 Hawthorne Street, ORC-3, San Francisco, CA, 94105, (415) 972-3891, Rongone.Marie@epa.gov.

XVI. INSURANCE

55) At least five (5) days prior to commencing any on-site work under this Order, the Respondent shall secure, and shall maintain for the duration of this Order, comprehensive general liability insurance and automobile insurance with limits of \$500,000 (five hundred thousand) dollars, combined single limit. Within the same time period, the Respondent shall provide EPA with certificates of such insurance and a copy of each insurance policy. If the Respondent demonstrate(s) by evidence satisfactory to EPA that any contractor or subcontractor maintains insurance equivalent to that described above, or insurance covering the same risks but in a lesser amount, then the Respondent need provide only that portion of the insurance described above which is not maintained by such contractor or subcontractor.

XVII. ADDITIONAL REMOVAL ACTIONS

56) If EPA determines that additional removal actions not included in an approved plan are necessary to protect public health, welfare, or the environment, EPA will notify Respondent of that determination. Unless otherwise stated by EPA, within thirty (30) days of receipt of notice from EPA that additional removal actions are necessary to protect public health, welfare, or the environment, Respondent shall submit for approval by EPA a Work Plan for the additional removal actions. The plan shall conform to the applicable requirements of Sections VI of this Order. Upon EPA's approval of the plan pursuant to Section VI., para.27.b (SOW and Implementation), Respondent shall implement the plan for additional removal actions in accordance with the provisions and schedule contained therein. This section does not alter or diminish the EPA Project Manager's authority to make oral modifications to any plan or schedule pursuant to Section XII.

XVIII. SEVERABILITY

57) If a court issues an order that invalidates any provision of this Order or finds that Respondent has sufficient cause not to comply with one or more provisions of this Order, Respondent shall remain bound to comply with all provisions of this Order not invalidated or determined to be subject to a sufficient cause defense by the court's order.

XIX. EFFECTIVE DATE

58) This Order shall be effective five (5) days after the Order is signed by the Superfund Branch Chief, unless a conference is requested as provided herein. If a conference is requested, this Order shall be effective on the day following the day of the conference unless modified in writing by EPA.

IT IS SO ORDERED

BY: Kathleen Salyer
Kathleen Salyer
Superfund Branch Chief
Region 9
U.S. Environmental Protection Agency

DATE: 3/6/2008

EFFECTIVE DATE: 3/13/08

Attachment A

STATEMENT OF WORK

Former Drilube Property at 718 West Wilson Avenue, Glendale, CA

1. Objective

Respondent shall perform a subsurface investigation at the former Drilube property at 718 West Wilson Avenue in Glendale, California (the Property) to fully characterize the extent of soil and groundwater contamination by contaminants of concern.

2. Site Background

The Property was occupied by the Drilube Company from approximately 1959 until 2004. The Drilube Company conducted metal plating and metal finishing processes for the aerospace industry. The Property layout included the plating areas, waste treatment area, and chemical storage rooms. Several sumps and pits were located on the Property associated with the plating processes. A fourstage clarifier was located along the southwest wall of the waste treatment area. A degreaser was located inside the main plating area. There were thirteen fixed treatment units located on the Property which were subject to the State's Permit by Rule regulations. The fixed treatment units included five treatment pit units, one pre-treatment container unit, one settling unit, three container treatment units, one vacuum filter process unit, one filter press, and one elementary neutralization unit. Chemicals used at the Property over the years included chromic acid, muriatic acid, nickel compounds, sodium hydroxide, ammonium hydroxide, caustic potash, ammonium nitrate, silver cyanide, copper cyanide, nitric acid, sodium dichromate, sulfuric acid, manganese phosphate, zinc phosphate, and various alkaline cleaners.

The Drilube Company submitted a work plan to the City of Glendale Environmental Management Center (EMC) in July 2004. The work plan proposed advancing thirty soil borings in various areas on the Property. These areas included the main plating room, the nickel plating room, the waste treatment area, the treatment sump area, the chemical storage room, the former cyanide plating room, and the former plating/assembly room. The soil borings were proposed to be advanced to a depth of 20-feet below ground surface (bgs). Soil samples were proposed to be analyzed for heavy metals, volatile organic compounds (VOCs), and cyanide. The work plan was approved by the EMC with minor additions to the soil sample depth intervals and laboratory analysis.

In August 2004, thirty soil borings were advanced on the Property using direct-push sampling technology. Eight soil borings (SB2 through SB5 and SB25 through SB28) were advanced in the room where the main plating lines were located. Three of these borings were advanced in sumps. Two soil borings (SB6 and SB7) were advanced in the former nickel plating

room. One of these borings was advanced in a sump. Eight soil borings (SB8 through SB12, SB29, and SB30) were advanced in the former waste treatment area. Two of the borings were advanced in the large treatment pit and three of the borings were advanced around the clarifier. One soil boring (SB20) was advanced in the former chemical storage room. Two soil borings (SB21 and SB24) were advanced in the former cyanide plating room. One of these borings was advanced in a sump. Two soil borings (SB22 and SB23) were advanced in the former plating/assembly room. Both of these borings were advanced in sumps. Seven soil borings (SB1 and SB14 through SB19) were advanced beneath the treatment sumps and trench located on the southern portion of the Property.

Generally, the soil samples collected from 2-feet, 5-feet, 10-feet, and 15-feet bgs from each soil boring were analyzed for VOCs and heavy metals. However, in some locations the drill rig encountered refusal terminating the soil boring at shallower depths. The results of the analysis indicated that the subsurface soil in the former waste treatment area (soil borings SB8 through SB12, SB29, and SB30) had been impacted with total chromium. Concentrations of total chromium were detected in the soil samples collected in this area at concentrations up to 12,000 milligrams per kilogram (mg/kg or parts per million [ppm]).

The highest concentration of tetrachloroethylene (PCE) detected was in the 5-foot bgs sample collected from soil boring SB26 at 64 micrograms per kilogram ($\mu\text{g/kg}$ or parts per billion [ppb]). Trichloroethylene (TCE) was detected in the 2-foot bgs soil sample collected from soil boring SB10 at 15 $\mu\text{g/kg}$.

3. Work To Be Performed

Respondent shall conduct a subsurface investigation in accordance with this Statement Of Work and all other relevant guidance used by EPA in conducting an investigation. Respondent shall submit a work plan within 30 days which includes, at a minimum, the work requirements outlined below for soil investigation. Respondent will submit a report summarizing the field activities and analytical results of such investigation within 90 days of work plan approval. The report will include photographs of the field activities and figures indicating the soil boring and well locations. Copies of analytical data and other applicable documents will be included in appendices to the reports.

Respondent shall submit a groundwater monitoring program work plan within 60 days which includes, at a minimum, the groundwater sampling and reporting requirements outlined below. Respondent shall submit the first quarterly groundwater monitoring program report within 90 days of work plan approval, and every 3 months thereafter.

Respondent shall clearly state data quality objectives, target contamination levels for delineation, and the rationale for their selection in the work plans. Delineation of contamination

concentrations in soil that may impact groundwater will be clearly identified as a goal of the sampling efforts.

a. Mobilization Activities

Prior to soil sampling activities, individual boring locations will be cleared using the USA notification processes. Underground pipelines and conduits which are identified within the boring area will be marked on the surface. Prior to conducting the soil boring activities on the Property in August 2004, a private utility locating company cleared the Property of underground utilities.

A Health and Safety Plan will be used to facilitate a pre-drilling safety meeting prior to conducting the fieldwork. Signatures of attendees will be collected at the meeting indicating an understanding of the risks and hazards involved in the drilling process. A copy of this document will be kept on site during the drilling process.

b. Soil Boring Locations

Five soil borings will be drilled on the Property inside the former waste treatment area where soil borings SB8 through SB12, SB29, and SB30 were previously advanced. Additional soil borings will be drilled in the former plating areas. The purpose of the soil sampling will be to delineate the lateral and vertical extent of contaminated soil beneath the Property. The results of the soil sampling activities proposed in this work plan will be used to characterize the impacted area and to design a remedial action for the contaminated soil.

Soil borings will be advanced for both lateral and vertical delineation in the former plating areas and waste treatment room. These soil borings will be drilled to a depth of 50-feet below ground surface (bgs). Soil samples will be collected at 5-foot intervals starting at 5-feet bgs.

c. Sample Methodology

The soil borings will be drilled using a limited access hollow-stem auger drill rig. A limited-access direct-push rig was utilized during the August 2004 subsurface assessment. However, at several locations, the direct-push rig encountered refusal at depths shallower than the anticipated depths of the soil borings proposed in this work plan. Respondent shall include an alternate plan for responding to drilling refusal before or during sample collection.

Soil samples will be collected using a Modified California Split Spoon Sampler and two-inch diameter by six-inch long stainless steel sample tubes. Soil samples will be collected by driving the Sampler attached to the end of steel rods into soil at each specific sample interval. Soil is collected inside the three two-inch diameter by six-inch long stainless steel tubes inside the Sampler. The Sampler is driven to the desired depth by a hydraulic "auto hammer," and then

retrieved to ground surface. Samples selected for analysis will be removed from the Sampler, capped with Teflon-lined plastic end caps, labeled with unique identification, and placed in a Ziplock® bag. The soil samples will then be stored in a chest for transportation to the analytical laboratory. Respondent shall follow chain-of-custody protocol.

After the soil samples have been collected, each borehole will be backfilled with bentonite chips hydrated with water.

In addition, Respondent will include soil vapor monitoring well installation and sampling or an alternative method to provide improved characterization of PCE at the Property.

d. Decontamination Procedures

To avoid cross-contamination between sampling points, Respondent will follow generally accepted decontamination procedures. All equipment that comes into contact with potentially contaminated soil will be decontaminated. This includes the sampling tools and rods. If the soil boring locations are advanced using a hand auger, the hand auger will be decontaminated between sampling points. Disposable equipment intended for one-time use will not be decontaminated, but will be packaged for appropriate disposal. The decontamination process consists of a non-phosphate detergent and tap water wash, followed by a tap water rinse and a deionized/distilled water rinses. Decontamination waste water will be placed in a 55-gallon and stored on the Property pending disposal profiling. The waste water will then be delivered to an appropriate facility for recycling or disposal.

e. Quality Assurance/Quality Control(QA/QC)

The QA/QC samples described below will be collected during this investigation. Respondent will specify the locations of the duplicate and laboratory QC samples.

Duplicate Soil Samples

Respondent will collect duplicate soil samples at a rate of one duplicate soil sample for every ten field soil samples. The duplicate soil samples will be collected and stored as described in Sample Methodology above. The duplicate soil samples will be analyzed for volatile organic compounds (VOCs), cyanide, and heavy metals.

Laboratory QC Samples

Respondent will include one laboratory QC sample, or matrix spike/matrix spike duplicate (MS/MSD) for every twenty soil samples. The number of soil samples will depend on how many of the archived samples are ultimately analyzed.

f. Laboratory Analysis

Respondent will deliver the soil samples, following chain of custody protocols, to a state of California certified environmental laboratory. Respondent shall provide a list in the work plan identifying the soil samples (including VOCs, cyanide, and heavy metals), corresponding analyses methods, and detection limits.

g. Disposal of Investigation Derived Waste

During the soil sampling activities at the Property, different types of potentially contaminated investigation derived waste may be generated. This includes the following:

- Used personal protective equipment (PPE) and disposable sampling equipment. Used PPE and disposable sampling equipment will be double bagged and placed in a municipal refuse dumpster. These wastes are not considered hazardous and can be sent to a municipal landfill.
- Decontamination water. Decontamination waste water will be placed in a 55-gallon and stored on the Property pending disposal profiling. The waste water will then be delivered to an appropriate facility for recycling or disposal.
- Excess soil from the soil borings. Excess soil cuttings generated during the soil sampling activities will be placed into 55-gallon drums and stored on the Property pending disposal profiling.

h. Soil Boring Location Rationale

The soil borings proposed in this work plan are to delineate the lateral and vertical extent of contaminated soil. Soil borings will be drilled to define the lateral and vertical extent of the impacted soil in the former plating areas and waste treatment area and to the north, south, and east of the former waste treatment area. The soil borings advanced during the August 2004 subsurface investigation were advanced to a total depth of 20 feet bgs, maximum.

i. Sample Analysis Rationale

The soil samples collected during this assessment will be analyzed for VOCs, cyanide, and heavy metals. The 5-feet, 10-feet, 15-feet, 20-feet, 30-feet, and 40-feet bgs from each of these soil borings will be analyzed for VOCs, cyanide, and heavy metals. For each of these soil samples, if concentrations of total chromium are detected above 2 mg/kg, Respondent will also have the soil sample(s) analyzed for hexavalent chromium. Additionally, if the 20-feet, 30-feet, and 40-feet bgs soil samples exhibit concentrations of VOCs, cyanide, or heavy metals above the lowest EPA Region 9 preliminary remediation goal soil screening level, then the 25-feet, 35-feet, 45-feet, and

50-foot bgs soil samples will also be analyzed for VOCs, cyanide, and heavy metals, as well as hexavalent chromium depending on the results.

j. Groundwater Sampling

Groundwater monitoring wells are located on the Property as well on adjacent sites to the southeast of the Property and to the west of the Property. Respondent shall initiate a quarterly groundwater sampling program for the Property to monitor the impacted groundwater beneath the Property. Respondent shall prepare a work plan for the initiation of the quarterly groundwater monitoring program for submittal to and approval by EPA.

4. Approval of Work

Respondent shall not commence any Work except in conformance with the terms of this Order. Respondent shall not commence implementation of the work plans developed hereunder until receiving written EPA approval.

5. Progress and Final Reports

Respondent shall submit a written progress report to EPA concerning actions undertaken pursuant to this Order on the last day of each month after the date of this Order until completion of all work required by this Order, as confirmed in writing by EPA. These reports shall describe all significant developments during the preceding period, including the actions performed and any problems encountered, analytical data received during the reporting period, and the developments anticipated during the next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems.

Respondent shall submit two copies (one hard copy and one electronic) of all plans, reports, or other submissions required by this Order, the Statement of Work, or any approved work plan.

Within thirty (30) days after completion of all Work required by this Order, Respondent shall submit for EPA review and approval a final report summarizing the actions taken to comply with this Order. The final report shall conform, at a minimum, with the requirements set forth in Section 300.165 of the National Contingency Plan ("NCP") entitled "OSC Reports." The final report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Order, a listing of quantities and types of materials removed off-Site or handled on-Site, a discussion of removal and disposal options considered for those materials, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed, and accompanying appendices containing all relevant documentation generated during the removal action (*e.g.*, manifests, invoices, bills, contracts, and

permits). The final report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

“Under penalty of law, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

6. Project Schedule

<u>Project Deliverable</u>	<u>Due Date</u>
Revised Subsurface Investigation Work Plan (incorporating September 24 EPA comments)	30 days (from Order Effective Date)
Project Progress Report and Schedule	30 days (from Order Effective Date)
Monthly Project Progress Reports and Schedule	Last day of each month
Any Subsequent Subsurface Investigation Work Plan Revisions	30 days (from EPA comment)
Groundwater Monitoring Program Work Plan	60 days (from Order Effective Date)
Groundwater Monitoring Program Work Plan Revisions	30 days (from EPA comment)
Subsurface Investigation Report	90 days (from work plan approval)
Subsurface Investigation Report Revisions	30 days (from EPA comment)
Groundwater Monitoring Program Report	90 days (from work plan approval)
Quarterly Groundwater Monitoring Program Reports	Every 3 months after 1 st report
<i>Groundwater Monitoring Program Report Revisions</i>	30 days (from EPA comment)
Final Report	30 days (from work completion)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 7, 2008

VIA FEDERAL EXPRESS, CERTIFIED MAIL, # 7003 3110 0006 2001 3162
RETURN RECEIPT REQUESTED, AND E-MAIL

Remy Mazmanian
718 West Wilson Avenue
Glendale, CA 91203

Re: Unilateral Administrative Order No. 2008-06 -- 718 West Wilson Avenue,
Glendale, California.

Dear Mr. Mazmanian:

Enclosed is Unilateral Administrative Order ("UAO") No. 2008-06. The UAO is being issued to you in your capacity as the owner of 718 West Wilson Avenue, Glendale, California ("Property"). The Property is part of the San Fernando Valley Area 2 Superfund Site, and is currently one of the sites that EPA is investigating in connection with the emerging contaminant hexavalent chromium. EPA has determined that you are the owner of the Property. The UAO requires you to conduct a subsurface investigation of soils and groundwater at the Property.

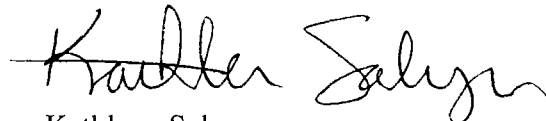
As set forth in CERCLA Sections 107(a) and 101(9), 42 U.S.C. §§ 9607(a) and 9601(9), liable persons include persons who own any "facility," including a site or area where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise come to be located. EPA determined that a release or threat of a release of hazardous substances, as defined at Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), occurred at or from the Property. As the owner of the Property, you are liable for all costs of removal or remediation at the Property, including necessary investigations. 42 U.S.C. § 9607(a)(1).

You have the opportunity to confer with EPA prior to the Effective Date of the UAO. See Sections XV and XIX. If you wish to request a conference, please contact Marie Rongone, Senior Counsel, at (415) 972-3891. Please note that you are required to provide EPA with Notice of Intent to Comply with the UAO within ten (10) days of the Effective Date. See

Remy Mazmanian
Page 2

Section IV, para. 23. If you have questions about the technical requirements of the UAO, please contact Bob Fitzgerald, Remedial Project Manager, at (213) 244-1814.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Salyer". The signature is fluid and cursive, with the first name "Kathleen" written in a larger, more prominent script than the last name "Salyer".

Kathleen Salyer
Chief, Site Cleanup Branch
Superfund Division

cc: Bob Fitzgerald, EPA

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GLENDAL, CA 91203

PS Form 3800, June 2002 See Reverse for Instructions

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Mar 8, 2008	7 38 AM At local FedEx facility	LOS ANGELES, CA	
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	3 18 AM Departed FedEx location	OAKLAND, CA	
Mar 7, 2008	10 11 PM Arrived at FedEx location	OAKLAND, CA	
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Requestor(s) Info:
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Name: Marie Rongone

Mailcode: ORC-3 Ext: 23891

Recipient(s) Info:

Company name: _____

Contact name: Remy Mazmanian

Address: 718 West Wilson Avenue

Apt/Suite/Room/Mailcode: _____

City: Glendale State: CA Zip: 91203

Country: U.S.A. Telephone: _____

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Requestor(s): Marie Rongone

Deputy Director(s): Dusty Miller

Signature: HONG-GUANG SHENG for

Signature: [Signature]

Date: _____

Date: 3/7/08

T# 1446 1473 9234